

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE
LIFE INSURANCE COMPANY, and
MANULIFE INSURANCE COMPANY (f/k/a
INVESTORS PARTNER INSURANCE
COMPANY),

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendants.

CIVIL ACTION NO. 05-11150-DPW
Hon. Judge Douglas P. Woodlock

STIPULATION REGARDING HANCOCK'S MOTION TO COMPEL

Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Manulife Insurance Company (f/k/a/ Investors Partner Life Insurance Company) (collectively, "John Hancock" or "Plaintiffs") and defendant Abbott Laboratories ("Abbott") (collectively, the "Parties") hereby submit this Stipulation Regarding Plaintiff's Motion to Compel.

WHEREAS, on July 13, 2007, Plaintiffs filed a "Motion to Compel Abbott Laboratories to Provide a Complete and Accurate Response to John Hancock's Interrogatory Seeking Abbott's Actual Spending During 'Each Year of the Four-Year Program Term.'" ("Motion to Compel")

WHEREAS, John Hancock's Motion to Compel seeks information regarding Abbott's research and development expenditures on the Program Compounds between March 13, 2001 and December 31, 2001;

WHEREAS, Abbott represents that it does not compile expenditure figures for the Program Compounds on a more precise level than by month in the ordinary course of its business and, therefore, is unable to produce records of its daily expenditures on each Compound;

WHEREAS, after meeting and conferring regarding the pending Motion to Compel, Abbott and John Hancock have reached the following agreement and jointly request that the Court so order:

1. John Hancock agrees to withdraw its Motion to Compel.
2. Abbott agrees to provide a verified amended response to Interrogatory No. 15 on or before August 3, 2007, which discloses its actual monthly spending on the nine Program Compounds in January, February and March of 2001.
3. Abbott agrees to produce the internal summary-level documents from which the numbers in the amended interrogatory response are derived (e.g., a summary report listing total monthly expenditures per compound) on or before August 3, 2007.

SO ORDERED this ____ day of _____, 2007

United States District Court Judge

JOHN HANCOCK LIFE INSURANCE
COMPANY, JOHN HANCOCK VARIABLE
LIFE INSURANCE COMPANY,
and MANULIFE INSURANCE COMPANY

By their attorneys,

/s/ Brian A. Davis

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Date: July 27, 2007

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

The undersigned hereby certifies that Abbott counsel has conferred with counsel for Hancock and resolved the issues presented by this Motion.

Dated: July 27, 2007

/s/ Michael S. D'Orsi

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on July 27, 2007.

Date: July 27, 2007

/s/ Michael S. D'Orsi
